

## Privacy

General Manager's Authorisation

Effective Date

Cheryl Cole



11 April 2025

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## 1. Purpose

- 1.1 The Fisheries Research and Development Corporation (**FRDC**) is required by law to have a clearly expressed and up to date policy about its management of personal information.
- 1.2 This privacy policy is written in simple language and outlines how the FRDC will handle personal information. The [Privacy Act 1988 \(Privacy Act\)](#), and in particular the Australian Privacy Principles (**APPs**) contains the specific legal obligations that the FRDC must follow when collecting and handling personal information.
- 1.3 The FRDC may review and update this privacy policy from time to time to take account changes to the FRDC's handling practices, new laws or technology. Changes to this privacy policy will be published on the FRDC's [website](#).
- 1.4 The FRDC will also provide copies of this privacy policy in another form if it is reasonable to do so.

## 2. Responsibility for policy

- 2.1 Responsibility for this policy resides with the General Manager, Finance and Business.

## 3. Definitions, Acronyms and Abbreviations

- 3.1 Definitions link [Definitions](#)
- 3.2 Acronyms Link [Acronyms and Abbreviations](#)

## 4. Risk Category

- 4.1 This policy covers the following risk categories:

Strategic	Governance	Service Delivery	Reputational	Financial	Operational	People
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## 5. Training

- 5.1 The training for the Policy will be communicated at inductions and staff meetings.

## 6. Document Management

If any material resulting from this policy is to be filed to Nemo, please complete the table below (*Refer to [Nemo Scenarios](#) or General Manager if unsure which metadata to use*):

Document Type/s	Information collected



Functional Group	Relevant Business activity, eg personnel, RD&E, Projects, Communications etc
Action Date	Date of action
Function type	Type eg Agreement, report etc
Organisation	Individual or Organisation
Prime activity	Where relevant eg Committees
Secondary activity	Relevant activity
Document type	Report, Correspondence etc

## 7. Relevant Documentation

<b>Relevant documentation</b>
<b>Internal</b>
<a href="#">Code of conduct policy</a>
<a href="#">Employees policy</a>
<a href="#">Procurement Policy</a>
<a href="#">Financial statements procedure</a>
<a href="#">Payments processing procedure</a>
<a href="#">Risk policy</a>
<a href="#">Risk Register</a>
<b>External</b>
<a href="#">FRDC Website Privacy Policy</a>
<a href="#">Archives Act 1983</a>
<a href="#">Primary Industries Research and Development Regulations 2024</a>
<a href="#">National Archives of Australia - Administrative Functions Disposal Authority</a>
<a href="#">FRDC Records Disposal Authority</a>
<a href="#">Privacy Act 1988</a>
<a href="#">Australian Government Agencies Privacy Code - Freedom of Information Act 1982</a>
<a href="#">Primary Industries Research and Development Act 1989</a>
<a href="#">Public Governance, Performance and Accountability Act 2013</a>

## 8. Publication

- 8.1 This policy is be made available on the FRDC website.
- 8.2 This policy is to be made available on the directors' site.

## 9. Why the FRDC collects personal information

- 9.1 The FRDC collects personal information which is reasonably necessary for, or directly related to, one or more of its functions or activities under the [Primary Industries Research and Development Act 1989](#) and the [Primary Industries Research and Development Regulations 2024](#).
- 9.2 The FRDC also collects personal information related to human resource management and other corporate service functions. Information about how we deal with information relating to FRDC employees and prospective employees can be found in our Human Resources Privacy Policy.

9.3 The FRDC primarily collects information by you giving us the information. For example, this may occur when:

- (a) an individual or organisation applies for funding for the purposes of a particular research and development project, or for an award or scholarship offered by the FRDC;
- (b) people subscribe to an email or mailing list so that the FRDC can send them information about the fishing industry (such as the FRDC News);
- (c) individuals submit information to the FRDC to be included in FRDC publications, or on the FRDC's social media (such as the Fishfiles All Access YouTube channel); and
- (d) an individual provides information to us in connection with a job application or their employment
- (e) contractors or suppliers who are working with the FRDC provide the FRDC with personal information about the individuals who will be providing goods or services to the FRDC, and
- (f) individuals writing to or contacting us.

9.4 The FRDC may also indirectly collect information about you from someone else under the following circumstances:

- (a) you consent to us doing so;
- (b) it is unreasonable or impracticable to collect the information from you;
- (c) the FRDC is required or authorised to do so under an Australian law or a court or tribunal order; or
- (d) the FRDC acquires mailing lists from State or Territory authorities who are responsible for granting fishing licenses, to enable the FRDC to send information to those individuals regarding the fishing industry.

## 10. **Collecting sensitive information**

10.1 Certain information the FRDC collects about you may be sensitive information as defined in the Privacy Act.

10.2 The FRDC generally only collects and holds sensitive information with the consent of the relevant individual. However, there are certain circumstances where the FRDC is authorised to collect and hold sensitive information without your consent. These circumstances include where:

- (a) the collection is required or authorised under an Australia law or a court/ tribunal order;

- (b) it is unreasonable or impracticable to obtain the individual's consent and the FRDC reasonably believes that collection is necessary to lessen or prevent a serious threat to somebody's life or health;
- (c) the FRDC reasonably believes that the collection is reasonably necessary to assist in the location of a missing person;
- (d) the FRDC reasonably believes that collection is necessary to allow the FRDC to take appropriate action when the FRDC has reason to suspect unlawful activity or misconduct of a serious nature that relates to the FRDC's functions or activities has been, is being or may be engaged in;
- (e) the collection is reasonably necessary to establish, exercise or defend a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process, or
- (f) the collection is for an integrity purpose (as defined in the *Crimes Act 1914*).

## 11. **Collecting through our website**

11.1 If you visit the FRDC's site to read or download information, the FRDC records the following information for statistical purposes:

- your server address and associated country;
- your top level domain name (e.g. gov, .com, .edu, .org, .au, .nz etc);
- pages you accessed and the documents you downloaded;
- search terms you used;
- date and time you visited the site;
- previous site you visited;
- your operating system (e.g. Windows, Mac);
- type of browser you use (e.g. Internet Explorer); and
- Access to information collected when you look at this website.

11.2 The FRDC will not attempt to identify non-web registered users or their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect the FRDC's Internet Service Provider's logs.

## 12. **Social networking services**

12.1 The FRDC uses social networking services such as Twitter, Facebook, LinkedIn and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also

handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for Twitter, Facebook and YouTube (a Google company) on their websites.

### 13. **Cookies, Google Analytics, and Clickstream data**

- 13.1 When you visit the FRDC website, we use a range of tools provided by third parties such as Google to collect or view website traffic information. These third party websites have their own privacy policies. We also use cookies and session tools to improve your experience when accessing our website. Information collected when you visit the FRDC website may include the IP address of the device you are using and information about sites that IP address has come from. We use this information to maintain, secure and improve our website. In relation to Google Analytics, you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.
- 13.2 The types of information we may collect from third party analytic tools includes:
- (a) Internet Protocol (IP) address;
  - (b) Browser and operating system, for example whether you use Internet Explorer or Chrome, Windows or iOS;
  - (c) Date and time of website visit;
  - (d) Pages visited, mouse clicks and documents downloaded from our websites;
  - (e) Device type, model, screen size and orientation;
  - (f) Language and geographic location (city/country) preferences (if enabled);
  - (g) Demographics and interests, for example age bracket and gender, along with interests expressed through online behaviour;
  - (h) Fields you've entered information into (such as search terms);
  - (i) How long it took to do certain tasks; and
  - (j) How you move through pages and the referring domain and outlink (if applicable).
- 13.3 To improve your experience on our site, we may also use 'cookies'. Cookies are pieces of information that a website can transfer to an individual's device for record keeping. Cookies can make websites easier to use by storing information about your preferences on a particular website. The information is used by us to help improve our website by understanding how it is used and effective communication methods for diverse audiences. We do not attempt to identify individual users in any way.
- 13.4 Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website.

- 13.5 Third party sites that we use to communicate with the public about our work (e.g. Twitter, Facebook and YouTube) may also send their own cookies to your computer. We do not control the setting of third-party cookies. You can check the third-party websites for more information about their cookies and how to manage them.
- 13.6 We also use third party tools that can collect analytics from online digital sources. These tools may collect metrics from social media websites and data from other media sources. All information we receive from these tools is not personally identifiable and is used in accordance with this privacy policy.
14. **Anonymity**
- 14.1 Individuals are free to make general enquiries or to subscribe for FRDC publications anonymously or using a pseudonym.
- 14.2 However, in most situations (particularly applications for grants) it is impracticable for the FRDC to deal with individuals who have not identified themselves or who have used a pseudonym.
- 14.3 If the FRDC does not collect personal information from an individual for the purposes of performing one of our functions, we may not be in a position to undertake the relevant function with respect to the relevant individual or issue. For example, if you choose not to provide the FRDC with personal details requested in an application form, the FRDC may not be able to properly assess your application.
- 14.4 If individuals are concerned about not being able to deal with the FRDC anonymously, they may be able to make an anonymous inquiry by contacting the FRDC's Privacy Officer and explaining the circumstances.
15. **Holding of personal information**
- 15.1 The FRDC holds all our records in accordance with the provisions of the *Archives Act 1983* (Cth) (Archives Act).
- 15.2 The FRDC will take reasonable steps to protect the personal information that it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.
- 15.3 Personal information which the FRDC collects and holds is generally either contained in a Commonwealth record (as defined in the Archives Act) or required to be retained by or under an Australian law. The FRDC manages Commonwealth records (including those that contain personal information) in accordance with the *Archives Act*, the Administrative Functions Disposal Authority, the FRDC Records Authority, and any other relevant Records Disposal Authority.
16. **Disclosure**
- 16.1 Where the FRDC holds personal information that was collected for a particular purpose (**original purpose**), the FRDC will not use or disclose the information for another

purpose (**secondary purpose**) unless this is permitted by the Privacy Act or another law. The FRDC may disclose personal information where:

- (a) the individual concerned has consented to the use or disclosure of the information for that secondary purpose, or
- (b) the secondary purpose falls within one of the specific exceptions in the Privacy Act or another law. This may occur, for example, where:
  - (i) the secondary purpose is related (or for sensitive information, directly related) to the original purpose of collection, and the individual would reasonably expect the FRDC to use or disclose the information for the secondary purpose;
  - (ii) the use or disclosure is required or authorised by or under an Australian law or a court/ tribunal order;
  - (iii) it is unreasonable or impracticable to obtain the individual's consent and the FRDC reasonably believes that collection is necessary to lessen or prevent a serious threat to somebody's life or health;
  - (iv) the FRDC reasonably believes that the collection is reasonably necessary to assist in the location of a missing person;
  - (v) the FRDC reasonably believes that use or disclosure is necessary to allow the FRDC to take appropriate action when the FRDC has reason to suspect unlawful activity or misconduct of a serious nature that relates to the FRDC's functions or activities has been, is being, or may be engaged in;
  - (vi) the use or disclosure is reasonably necessary for establishing, exercising or defending a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process, or
  - (vii) FRDC reasonably believes the disclosure is reasonably necessary for the enforcement by the AFP or another enforcement body of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue;
  - (viii) the use is for an integrity purpose (as defined in the *Crimes Act 1914*) relating to the FRDC, or
  - (ix) the disclosure is to the AFP for an integrity purpose (as defined in the *Crimes Act 1914*) that the FRDC reasonably believes is related to one or more of the AFP's functions and activities.

## 17. **Disclosure to service providers**

- 17.1 We use a number of service providers to whom we disclose personal information. These include service providers that host our website servers, manage our IT and manage our human resources information.

- 17.2 To protect the personal information we disclose to these service providers, we:
- (a) enter into agreements which requires the service provider to only use or disclose the information for the purposes of the agreement;
  - (b) include special privacy requirements in the agreement, where necessary.

## 18. **Overseas disclosure**

- 18.1 The FRDC will only disclose personal information to a person who is not in Australia or an external Territory in a way that is compliant with Australian Privacy Principle 8.
- 18.2 The FRDC may disclose personal information overseas if we are dealing with a person who is located overseas.
- 18.3 Web traffic information is disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries.
- 18.4 When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

## 19. **Quality of personal information**

- 19.1 To ensure that the personal information we collect is accurate, up-to-date and complete we:
- (a) record information in a consistent format;
  - (b) where necessary, confirm the accuracy of information we collect from a third party or a public source;
  - (c) promptly add updated or new personal information to existing records; and
  - (d) regularly audit our contact lists to check their accuracy.
- 19.2 We also review the quality of personal information before we use or disclose it.

## 20. **FRDC's compliance with the Australian Privacy Principles (APP)**

- 20.1 The FRDC has implemented practices, procedures and systems to ensure that it complies with the APPs, including:
- (a) requiring all FRDC staff to be trained in relation to the FRDC's obligations under the APPs and this privacy policy;
  - (b) ensuring this privacy policy is regularly reviewed and updated; and
  - (c) undertaking a program of privacy reviews to make sure that the FRDC's privacy policy is being fully implemented.
- 20.2 The Australian Government Agencies Privacy Code requires the FRDC to conduct PIAs on high privacy risk projects. Section 12(2) of the Privacy Code states that a project may

be a high privacy risk project if the agency reasonably considers that the project involves any new or changed ways of handling personal information that are likely to have a significant impact on the privacy of individuals.

- 20.3 The FRDC maintains a public register of the Privacy Impact Assessment (PIAs) it conducts which is available on the FRDC's website at <https://www.frdc.com.au/frdc-privacy-policy>.

## 21. **Accessing and correcting your personal information**

- 21.1 Under the Privacy Act (APPs 12 and 13) you have the right to ask for access to personal information that the FRDC holds about you, and ask that we correct that personal information. You can ask for access or correction by contacting us and we must respond within 30 days. If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.
- 21.2 We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.
- 21.3 If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.
- 21.4 If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.
- 21.5 You also have the right under the [Freedom of Information Act 1982](#) to request access to documents that we hold and ask for information that we hold about you to be changed or annotated if it is incomplete, incorrect, out-of-date or misleading.

## 22. **Complaints**

- 22.1 If you wish to complain to us about how we have handled your personal information you should complain to us in writing, addressed to our Privacy Officer at the email or postal address below.
- 22.2 The FRDC will take reasonable steps to investigate any complaint, and to notify you of the outcome of our investigation within 30 days.
- 22.3 If the FRDC does not respond to the complaint within 30 days, or you are not satisfied with the outcome of our investigations, you can make a complaint directly to the Office of the Australian Information Commissioner (OAIC). Further details about how to make a complaint to the OAIC are available on the OAIC's website.

23. **Contact us**

You can contact the FRDC's Privacy Officer by:

- (a) telephone: 02 6122 2100
- (b) e-mail: [privacy@frdc.com.au](mailto:privacy@frdc.com.au)
- (c) post: Privacy Officer

General Manager Finance and Business

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